

ORIGINAL
(Red)

POLREP 1

E-2 CHEMICAL CO. SITE
LAUREL AND CANAL STREETS
PHILADELPHIA, PA

ATTN: TIM FIELDS, STEVE JARVELA AND CHARLIE KLEEMAN

I. SITUATION (2000 HOURS, 4/6/89)

A. ON 4/4/89, THE PHILA. FIRE DEPT. (PFD) REQUESTED THAT EPA REGION III CONDUCT A JOINT INSPECTION OF THE E-2 CHEMICAL CO. SITE IN PHILADELPHIA, PA.

B. E-2 CHEMICAL IS APPROX. 1.5 ACRES IN SIZE. AN ESTIMATED 2000 DRUMS ARE PRESENT IN VARIOUS CONDITIONS. ALSO ON SITE ARE APPROX. 30 ABOVE-GROUND TANKS. E-2 REPORTEDLY OPERATED AS A RE-PACKAGING FACILITY, TAKING LARGER QUANTITIES OF CHEMICALS AND REPACKAGING THEM INTO SMALLER CONTAINERS. THE SITE IS ADJACENT TO A MEAT PACKING FIRM, HORSE STABLES, AND A TRANSPORTATION SERVICE STATION. THE SITE IS APPROX. ONE BLOCK FROM I-95 AND ELEVATED TRAIN LINE AND TWO BLOCKS FROM RESIDENTIAL COMPLEXES. THE IMMEDIATE AREA IS MAINLY COMMERCIAL.

C. OSC KOOB PERFORMED A JOINT INSPECTION WITH THE PHILA. FIRE DEPT, L&I, CITY SOLICITOR'S OFFICE, FIRE MARSHALL AND CITY MANAGING DIRECTOR'S OFFICE. ACCESS WAS FREELY GIVEN BY THE PROPERTY OWNER WHO WAS PRESENT. ACCORDING TO CITY OFFICIALS, NEIGHBORING BUSINESSES HAVE AT VARIOUS TIMES COMPLAINED OF FUMING DRUMS AND OBNOXIOUS ODORS.

D. L&I SERVED THE FACILITY WITH A CEASE, DESIST AND EVACUATE ORDER ON 4/5/89 AFTER THE JOINT INSPECTION.

E. A MEETING WAS HELD AT 1630 HRS AT EPA REGIONAL OFFICE BETWEEN ABC CARNEY, OSC HESTON, OSC KOOB, ENFORCEMENT THOMAS AND TAT REGARDING AN EMERGENCY ASSESSMENT TO BE PERFORMED ON 4/6/89.

F. AN ADDITIONAL INSPECTION WAS CONDUCTED AT 0930 HRS 4/6/89 BY EPA (OSCs, OPA, & ENFORCEMENT), TAT, PHILA. WATER DEPT., PFD HAZ MAT, PHILA OFFICE OF EMERGENCY MANAGEMENT AND PHILA AIR MANAGEMENT. HAPHAZARD STORAGE OF DRUMS AND DETERIORATED FIBER, PLASTIC, AND METAL CONTAINERS WAS OBSERVED. DRUM LABELS INDICATED THAT INCOMPATIBLE MATERIALS WERE PRESENT WITHOUT SEGREGATION. AREAS OF SPILLAGE AND LEAKING CONTAINERS WERE OBSERVED AND DOCUMENTED. ALSO LOCATED ON SITE IS A BUILDING OF WHICH THE SECOND FLOOR IS A LABORATORY WITH SUSPECTED SHOCK-SENSITIVE MATERIALS AND NUMEROUS UNSEGREGATED INCOMPATIBLE MATERIALS. A LARGE TANK (APPROX. 1 MILLION GALS.) WAS ONSITE WITH AN ENTRANCE CUT INTO ITS BASE LARGE ENOUGH FOR A TRUCK TO DRIVE INTO. THIS AREA APPEARED TO BE A DUMPING AREA, POOLED WITH WATER, FOR NUMEROUS UNKNOWN CONTAINERS AND MATERIALS.

G. MEDIA INTEREST WAS HIGH- THREE LOCAL TELEVISION CREWS ON SCENE. OPA SINGLAIR UPDATED MEDIA ON EPA/CITY ACTIONS ON SCENE.

H. AN OPERATIONS MEETING WAS HELD IMMEDIATELY FOLLOWING THE INSPECTION AT THE FIRE DEPT HQ. EPA, TAT, PFD, POLICE, WATER DEPT., PHILA. AIR MANAGEMENT AND OEM DISCUSSED FINDINGS OF THE INSPECTION, FACILITY BACKGROUND, AND FUTURE PLANS.

I. PD PROVIDING SECURITY AT SITE SINCE CEASE AND DESIST ORDER.

J. WEATHER: LIGHT RAIN, 55 DEG.

II. ACTIONS TAKEN

A. OSCs HESTON, KOOB, & ENGLISH MET WITH EPA ENFORCEMENT (CRES) THOMAS AND RHO TO DISCUSS SCOPE OF WORK TO BE REQUIRED OF PROPERTY OWNER. OSC ASSIGNED ASST. REG. COUNSEL WALTERS.

B. AT 1530 HRS, OSCs HESTON, KOOB AND ENGLISH, CRES THOMAS AND KHO, AND ORC WALTERS HELD A CONFERENCE CALL WITH MR. ROBERT STACK, THE ATTORNEY FOR THE PROPERTY OWNER. THE SCOPE OF WORK WAS RELAYED TO STACK, WHO STATED THAT HE WOULD ADVISE HIS CLIENT TO GRANT ACCESS AND COOPERATE FULLY WITH EPA ACTIONS; HOWEVER, HIS CLIENT DOES NOT HAVE THE FINANCIAL RESOURCES NECESSARY TO PERFORM THE REQUIRED WORK. ORC WALTERS FAX'D ACCESS CONSENT AGREEMENT TO STACK FOR SIGNATURE.

C. OSC HESTON DISCUSSED WITH CRES ASPECTS OF THE OWNER'S LIMITED ACCESS TO THE SITE AS DECREED BY LAI CEASE & DESIST. CRES TO COORDINATE WITH LAI IF PROPERTY OWNER CAN ASSIST IN DRUM IDENTIFICATIONS.

D. CITY FIRE MARSHALL CERTIFIED VERBALLY TO OSC ENGLISH THAT THE SITE IS A FIRE AND EXPLOSION THREAT. PFD HAS HAD IN PLACE A CONTINGENCY PLAN SPECIFIC TO THIS SITE.

E. FUNDING REQUEST DRAFTED FOR RA REVIEW ON 4/7/89.

F. SAFETY PLAN PREPARED. ARRANGEMENTS MADE FOR MOBILE COMMAND POST TO BE ON SCENE TOMORROW 4/7/89.

III. FUTURE PLANS

A. OSCs TO BRIEF REGIONAL ADMINISTRATOR ON 4/7/89 TO EFFECT EXPEDITIOUS FUNDING OF THIS SITE.

B. REGIONAL ERCS (GUARDIAN) TO BE ACTIVATED AND ON SITE 4/7/89.

C. OSCs AND TAT TO COORDINATE LOGISTICS OF MOBILIZATION.

D. OSCs AND TAT TO COORDINATE WITH PFD FOR CONTINGENCY PLANNING

E. FOLLOWING RA APPROVAL OF PROJECT:

- SECURITY GUARDS TO BE OBTAINED TO RELIEVE PFD PERSONNEL.
- BREACHES IN FENCE TO BE REPAIRED OR REPLACED 4/7/89.
- OPA SINCLAIR TO COORDINATE PRESS RELEASE; NEWS MEDIA EXPECTED ON SCENE 4/7/89.

F. CRES TO INVESTIGATE OTHER VIABLE PRPs FROM DRUM LABELS OR POSSIBLE CLIENT LISTINGS/RECORDS.

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